

John E. Rooney
312-876-8925
jrooney@sonnenschein.com

8000 Sears Tower
233 South Wacker Drive
Chicago, IL 60606 *Chicago*
312.876.8000 *Kansas City*
312.876.7934 fax *Los Angeles*
www.sonnenschein.com *New York*
San Francisco
St. Louis
Washington, D.C.
West Palm Beach

October 9, 2001

VIA E-MAIL & U.S. MAIL

Mr. Sam McClerren
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, Illinois 62701

Re: ICC Docket No. 01-0539
Informal Comments Of Verizon

Dear Sam:

Pursuant to your request, Verizon submits these comments addressing the example "Business Rule" circulated at the last workshop, and the appropriate disaggregation level to be utilized. These comments are submitted in anticipation of next week's workshop and, therefore, are for settlement discussions only.

As an initial matter, Verizon generally agrees with the McLeod/AT&T position that only a select core set of measures be included in the resulting wholesale rules. As Verizon has stated previously, any set of wholesale rules should be limited in scope, but such rules also should recognize that certain carriers have extensive wholesale obligations that should serve as those carriers' individual wholesale rules. (For Verizon, such obligations are set forth in its' OSS Collaborative Final Report submitted to the Commission.) While Verizon does not agree fully with the measurements that McLeod/AT&T identified, there is overlap between our two proposals, and this may serve as the basis for resolution. In this regard, it should be noted that Verizon does not support redundant measurements for the same function. Overall, this approach would allow the wholesale rules to include all relevant telecommunications carriers, while minimizing any reporting burden.

Turning to the example "Business Rule", it is Verizon's position that incorporating the level of detail depicted in the example "Business Rule" will severely limit the flexibility of the industry and the Commission to accommodate and react to the dynamic nature of the competitive environment. Accordingly, the wholesale rule should identify the function(s) on which

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monitoring and reporting is desired (or required). The rule should specify scope by requiring the following elements for monitoring and reporting of the function:

- Definition/Description
- Exclusions
- Performance Standard
- Report Dimensions
- Sub Metrics Method of Calculation

Each carrier would be responsible for submitting to the Commission the detail and documentation supporting the required metrics.

Importantly, no modifications should be made to any required metric, measurement process, start point, end point, definition or any other parameter that would change the measurement without submitting such changes to the Commission. In addition, the rule should provide that the Commission has the discretion to exempt a carrier from reporting a specific wholesale function/metric if the carrier demonstrates that its system processes are providing parity by design.

Finally, Verizon supports geographic reporting of performance measures at the state level.

Verizon personnel will be available and ready to discuss this proposal at next week's workshop. In the event you have any questions prior to that time, please call.

Sincerely,

John E. Rooney

JER:hpd
Enc.